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9 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2010-387**

12 **HILDA ANGUIANO RAMIREZ**
13 **26262 Via California**
14 **Capistrano Beach, CA 92624**

A C C U S A T I O N

15 **Registered Nurse License No. 552163**

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
22 of Consumer Affairs.

23 2. On or about January 18, 1999, the Board of Registered Nursing issued Registered
24 Nurse License Number 552163 to Hilda Anguiano Ramirez (Respondent). The Registered Nurse
25 License was in full force and effect at all times relevant to the charges brought herein and will
26 expire on January 28, 2011, unless renewed.

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1 15. Respondent is subject to disciplinary action pursuant to Code section 2761(a)(1) on
2 the grounds of unprofessional conduct, in that on the date indicated above, Respondent was guilty
3 of gross negligence in her care of patient R.H. within the meaning of Regulation 1442, as follows:
4 Respondent was grossly negligent in the administration of Potassium Phosphate peripherally.
5 Respondent was grossly negligent in choosing the foot for the administration of Potassium
6 Phosphate and for failing to recognize that the site had infiltrated.

7 **SECOND CAUSE FOR DISCIPLINE**

8 (Incompetence)

9 16. Complainant incorporates by reference as though fully set forth herein the allegations
10 contained in paragraphs 9 through 15, above.

11 17. Respondent is subject to disciplinary action pursuant to Code section 2761(a)(1) on
12 the grounds of unprofessional conduct, in that on the date indicated above, Respondent was guilty
13 of incompetence in choosing the foot for the administration of Potassium Phosphate and for
14 failing to recognize that the site had infiltrated, as set forth above.

15 **THIRD CAUSE FOR DISCIPLINE**

16 (Unprofessional Conduct)

17 18. Complainant incorporates by reference as though fully set forth herein the allegations
18 contained in paragraphs 9 through 17, above.

19 19. Respondent is subject to disciplinary action pursuant to Code section 2761(a), in that
20 Respondent committed acts constituting unprofessional conduct, as set forth above.

21 **PRAYER**

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
23 and that following the hearing, the Board of Registered Nursing issue a decision:

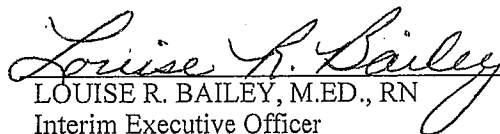
24 1. Revoking or suspending Registered Nurse License Number 552163, issued to Hilda
25 Anguiano Ramirez.

26 2. Ordering Hilda Anguiano Ramirez to pay the Board of Registered Nursing the
27 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
28 Professions Code section 125.3;

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3. Taking such other and further action as deemed necessary and proper.

DATED: 2/16/10


LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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